

PAIA MANUAL

OF

**GLACIER FINANCIAL HOLDINGS (PTY) LTD
(REGISTRATION NUMBER: 2000/000380/07)**

**PREPARED IN TERMS OF SECTION 51 OF THE
PROMOTION OF ACCESS TO INFORMATION
ACT 2 OF 2000 (AS AMENDED)**

**DATE OF COMPILATION: 01/10/2011
DATE OF REVISION: 01/12/2021**

1. LIST OF ACRONYMS AND ABBREVIATIONS

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| 1.1 | “CEO” | Chief Executive Officer |
| 1.2 | “DIO” | Deputy Information Officer; |
| 1.3 | “Glacier” | Glacier Financial Holdings (Pty) Ltd and all such entities as set out in paragraph 3 of this manual; |
| 1.4 | “IO” | the designated Information Officer as described in this manual, responsible for discharging the duties and responsibilities assigned to the Information Officer as prescribed in terms of PAIA and POPIA; |
| 1.5 | “Minister” | Minister of Justice and Correctional Services; |
| 1.6 | “PAIA” | Promotion of Access to Information Act No. 2 of 2000 (as Amended); |
| 1.7 | “Personal Information” | as defined in section 1 of POPIA; |
| 1.8 | “POPIA” | Protection of Personal Information Act No.4 of 2013, as amended from time to time including the regulations promulgated in terms of the POPIA; |
| 1.9 | “Regulator” | Information Regulator; |
| 1.10 | “Republic” | Republic of South Africa; |
| 1.11 | “this Manual” | this PAIA manual together with all annexures thereto as available at the offices of Glacier from time to time; |

2. PURPOSE OF PAIA MANUAL

This Manual is useful for the public to-

- 2.1 check the categories of records held by a body which are available without a person having to submit a formal PAIA request;
- 2.2 have a sufficient understanding of how to make a request for access to a record of the body, by providing a description of the subjects on which the body holds records and the categories of records held on each subject;
- 2.3 know the description of the records of the body which are available in accordance with any other legislation;

- 2.4 access all the relevant contact details of the Information Officer and Deputy Information Officer who will assist the public with the records they intend to access;
- 2.5 know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 2.6 know if the body will process personal information, the purpose of processing of personal information and the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.7 know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.8 know the recipients or categories of recipients to whom the personal information may be supplied;
- 2.9 know if the body has planned to transfer or process personal information outside the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied; and
- 2.10 know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

3. OVERVIEW OF GLACIER

Glacier Financial Holdings (Pty) Ltd is the holding company of Glacier Financial Solutions (Pty) Ltd, a licensed financial services provider offering a wide range of investment solutions and related financial services products, and Glacier Management Company (RF) (Pty) Ltd, a collective investment company that manages the Glacier Money Market Fund, Glacier AI Flexible Fund of Funds and the Glacier Global Stock Feeder Fund (which funds may be updated from time to time).

In this manual, any reference to “Glacier” shall include the following entities:

- Glacier Financial Solutions (Pty) Ltd;
- Glacier Financial Holdings (Pty) Ltd;
- Axis Nominees (Pty) Ltd;
- Glacier Advisory Services (Pty) Ltd;
- Glacier Management Company (RF)(Pty) Ltd;
- Glacier International, a division of Sanlam Life Insurance Limited;

- Personal Portfolios Preservation Provident Fund (administered by Glacier Financial Solutions (Pty) Ltd);
- Personal Portfolios Preservation Pension Fund (administered by Glacier Financial Solutions (Pty) Ltd); and
- Personal Portfolios Retirement Annuity Fund (administered by Glacier Financial Solutions (Pty) Ltd).

4. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION

4.1. Chief Information Officer

Name: Gudani Mukatuni
 Tel: 27 21 917 9002
 Email: GlacierIO@Sanlam.co.za

4.2. Chief Information Officer of the Personal Portfolios Retirement Annuity Fund, Personal Portfolios Preservation Pension Fund and Personal Portfolios Preservation Provident Fund

Name: Johan Hein
 Tel: 021 917 9002
 Email: GlacierIO@Sanlam.co.za

4.3. Deputy Information Officer

Name: Eugene Moodley
 Tel: 021 917 9002
 Email: GlacierIO@Sanlam.co.za

4.4 Access to information general contacts

Email: client.services@glacier.co.za

4.5 Head Office

Postal Address: Private Bag X5, Tyger Valley, 7536
 Physical Address: 1 Sportica Crescent, Glacier Place, Tyger Valley, 7536
 Telephone: (021) 917-9002
 Email: client.services@glacier.co.za

Website: www.glacier.co.za

5. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

- 5.1. The Regulator has, in terms of section 10(1) of PAIA, as amended, updated and made available the revised Guide on how to use PAIA (“Guide”), in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA.
- 5.2. The Guide is available in each of the official languages and in braille.
- 5.3. The aforesaid Guide contains the description of-
 - 5.3.1. the objects of PAIA and POPIA;
 - 5.3.2. the postal and street address, phone and fax number and, if available, electronic mail address of-
 - 5.3.2.1. the Information Officer of every public body, and
 - 5.3.2.2. every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA and section 56 of POPIA;
 - 5.3.3. the manner and form of a request for-
 - 5.3.3.1. access to a record of a public body contemplated in section 11; and
 - 5.3.3.2. access to a record of a private body contemplated in section 50;
 - 5.3.4. the assistance available from the IO of a public body in terms of PAIA and POPIA;
 - 5.3.5. the assistance available from the Regulator in terms of PAIA and POPIA;
 - 5.3.6. all remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging-
 - 5.3.6.1. an internal appeal;
 - 5.3.6.2. a complaint to the Regulator; and
 - 5.3.6.3. an application with a court against a decision by the information officer of a public body, a decision on internal appeal or a

decision by the Regulator or a decision of the head of a private body;

5.3.7. the provisions of sections 14 and 51 requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;

5.3.8. the provisions of sections 15 and 52 providing for the voluntary disclosure of categories of records by a public body and private body, respectively;

5.3.9. the notices issued in terms of sections 22 and 54 regarding fees to be paid in relation to requests for access; and

5.3.10. the regulations made in terms of section 92.

5.4. Members of the public can inspect or make copies of the Guide from the offices of the public and private bodies, including the office of the Regulator, during normal working hours.

5.5. The Guide can also be obtained-

5.5.1. upon request to the Information Officer;

5.5.2. from the website of the Regulator (<https://www.justice.gov.za/infoereg/>).

5.6 A copy of the Guide is also available at Glacier's premises in the following two official languages, for public inspection during normal office hours-

5.6.1 English

5.6.2 Afrikaans

6. CATEGORIES OF RECORDS WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

At this stage no notices have been published by the Information Regulator on the categories of records automatically available without a person having to request access thereto in terms of PAIA.

The records that are located on the Glacier website, however, are automatically available and are freely accessible to any person requesting this information. It is therefore not necessary to apply for access thereto in terms of PAIA. Glacier's website address is www.glacier.co.za

7. DESCRIPTION OF THE RECORDS WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

Glacier is required in accordance with legislation to retain certain records. We hold records for the purposes of PAIA in accordance with *inter alia* the following legislation (*please note this is not an exhaustive list):

- Long-term Insurance Act, 52 of 1998
- Insurance Act, 18 of 2017
- Employment Equity Act, 55 of 1998
- Financial Advisory and Intermediary Services Act, 37 of 2002
- Administration of Estates Act, 66 of 1965
- Pension Funds Act, 24 of 1956
- Skills Development Levies Act, 9 of 1999
- Policyholder Protection Rules issued in terms of the Long-term Insurance Act, 52 of 1998
- Income Tax Act, 58 of 1962
- Collective Investment Schemes Control Act, 45 of 2002
- Value-Added Tax Act, 89 of 1991
- Trust Property Control Act, 57 of 1988
- Pension Fund Regulations issued in terms of the Pension Funds Act, 24 of 1956
- Financial Markets Act, 19 of 2012
- Consumer Protection Act, 68 of 2008
- Labour Relations Act, 66 of 1995
- Companies Act, 71 of 2008
- Consumer Affairs (Unfair Business Practices Act), 71 of 1988
- Occupational Health and Safety Act, 85 of 1993
- Inspection of Financial Institutions Act, 80 of 1998
- Prevention of Organised Crime Act, 121 of 1998
- Compensation for Occupational Injuries and Diseases Act, 130 of 1993
- Basic Conditions of Employment Act, 75 of 1997
- Financial Intelligence Centre Act, 38 of 2001

- Unemployment Insurance Act, 63 of 2001
- Electronic Communications and Transactions Act, 25 of 2002
- Financial Sector Regulation Act, 9 of 2017
- Financial Institutions (Protection of Funds) Act, 28 of 2001
- Protection of Personal Information Act, 4 of 2013
- Bermuda Insurance Act, 39 of 1978

8. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT

The table below contains a description of the types of records / subjects on which Glacier holds, and the categories of records held on each subject. These records are not automatically available without a request in terms of PAIA. A request made in terms of PAIA for records in any of the categories below may be refused in accordance with any of the grounds of refusal as set out in PAIA.

Subjects on which the body holds records	Categories of records
Strategic Documents, Plans, Proposals	<ul style="list-style-type: none"> • Annual Reports • Strategic Plan • Annual Performance Plan.
Statutory records	<ul style="list-style-type: none"> • Company incorporation documents • Share register • Memorandum of Incorporation • Minutes of meetings of the board of directors • Records relating to the appointment of directors, auditors, and other officers
Income tax	<ul style="list-style-type: none"> • Pay-as-you-earn (PAYE) records • Documents issued to employees for income tax purposes • Records of payments made to South African Revenue Services on behalf of employees • All or any statutory compliance • Value Added Tax • Skills development levies • Unemployment Insurance Fund
Labour relations records	<ul style="list-style-type: none"> • Personnel documents and records • Employment contracts • Medical aid records

Subjects on which the body holds records	Categories of records
	<ul style="list-style-type: none"> • Retirement fund records • Disciplinary records • Salary records • Disciplinary code and/or procedures • Leave records • Training records • Training manuals • Address lists • Internal telephone lists
Finance	<ul style="list-style-type: none"> • Receipts and payments • Bank statements • Budgets • Management accounts • Asset registers • Invoices • Salaries • Minutes of meetings • Correspondence
Risk and compliance	<ul style="list-style-type: none"> • Contracts • Policies and procedures • Risk assessment • Compliance records
Marketing	<ul style="list-style-type: none"> • Market Information • Public Customer Information: <ul style="list-style-type: none"> ○ Product Brochures ○ Owner Manuals • Performance Records • Product Sales Records • Marketing Strategies • Customer Database
Other	<ul style="list-style-type: none"> • IT usage statistics and equipment details • Supplier lists • Secretarial records • Media releases and public relation events records

8. PROCESSING OF PERSONAL INFORMATION

8.1 POPIA

Chapter 3 of POPIA provides for the minimum conditions for lawful

processing of Personal Information. These conditions may not be derogated from unless specific exclusions apply as outlined in POPIA.

Glacier processes personal information in accordance with POPIA. In terms of our privacy policy, Glacier will ensure that all processing conditions of POPIA are complied with at the time of processing of personal information. Glacier processes personal information of both living and juristic persons.

8.2 Purpose of Processing Personal Information

Glacier will process your information in the ordinary course of the business of providing financial and related services. Primarily, Glacier will use your personal information only for the purpose for which it was originally or primarily collected. Your personal information will only be used for a secondary purpose if such purpose constitutes a legitimate interest and is closely aligned with the original or primary purpose for which your personal information was collected. Glacier collects and processes personal information for a number of reasons, including but not limited to:

- meeting our responsibilities to our customers;
- general human resource and finance functions including those obligations imposed by legislation;
- recruitment;
- meeting our contractual responsibilities to third-party service providers;
- informing customers of products and services;
- complying with all legal and regulatory requirements, including industry codes of conduct;
- protecting and pursue the legitimate interests of the Sanlam Group; and
- for any further purposes related to the above.

For more information please visit our Privacy Notice and www.sanlam.co.za

8.3 Description of the categories of Data Subjects and of the information or categories of information relating thereto

Categories of Data Subjects	Personal Information that may be processed
Investors / Clients	Name, surname, South African identity number or passport number, date of birth, age, marital status, citizenship, telephone numbers, email address, physical and postal addresses, income tax number, financial information, banking information including account numbers, FICA documentation.
Nominated beneficiaries/dependents	Name, surname, South African identity number or passport number, date of birth, age, marital status, citizenship, telephone numbers, email address,

Categories of Data Subjects	Personal Information that may be processed
	physical and postal addresses, income tax number, financial information, banking information including account numbers, FICA documentation.
Service Providers (including outsourced services)	Company registration details, identity numbers, BEE certificates, tax clearance, income tax and VAT registration details, payment information including bank account numbers, invoices, contractual agreements, addresses, contact details.
Brokers/advisors	Company registration details, identity numbers, BEE certificates, tax clearance, income tax and VAT registration details, payment information including bank account numbers, invoices, contractual agreements, addresses, contact details.
Employees (including prospective employees)	Name, surname, South African identity number or other identifying number, contact details, physical and postal address, date of birth, age, marital status, race, disability, information, employment history, criminal background checks, CVs, education history, banking details, income tax reference number, remuneration and benefit information, health information, details related to employee performance, disciplinary procedure information, biometric data.
Juristic persons, beneficial owners and persons acting on behalf of juristic person	Entity name, registration number, tax-related information, contact details for representatives, banking information including account numbers, FICA documentation.

8.4 The recipients or categories of recipients to whom the personal information may be supplied

We may disclose your personal information to third parties such as our associates and service providers, for legitimate business purposes, in accordance with applicable law and subject to the applicable professional and regulatory requirements regarding confidentiality.

Should Glacier disclose your information to third parties, the latter will be obliged to use that personal information for the reasons and purposes the information was disclosed for. To this end, we have agreements in place with the relevant third parties to ensure that an adequate level of security and confidentiality is adopted by the third parties to which your personal information is being transferred to.

8.5 Transborder flows of personal information

Glacier may send your personal information to service providers outside of the Republic of South Africa. Glacier will not send your information to a country that does not have information protection legislation similar to that of the Republic, unless we have ensured that the recipient agrees to effectively adhere to the principles for processing of information in accordance with the Protection of Personal Information Act No 4 of 2013.

8.6 Information Security Measures

Glacier takes reasonable, appropriate and adequate technical and organisational measures to ensure that your personal information is kept secure and is protected against unauthorised or unlawful processing, accidental loss, destruction, damage, alteration, disclosure or unauthorised access. We contractually mandate any third parties to which your personal information is transferred to do the same.

Glacier regularly reviews our security controls and related processes to ensure that your personal information is secure. However, where there are reasonable grounds to believe that your personal information has been accessed or acquired by any unauthorised person, we will notify the Information Regulator and you, unless the Information Regulator or a public body responsible for detection, prevention or investigation of offences, informs us that notifying you will impede a criminal investigation.

9. HOW TO REQUEST ACCESS TO A RECORD

- 9.1 To request a record in terms of PAIA, the requestor must complete the prescribed form attached to this manual as Annexure A. This request must be sent to the Information Officer at the addresses provided in paragraph 4.1.
- 9.2 For POPIA-related requests to object to the processing of personal information, correct or delete personal information, the request must be made in writing on the applicable prescribed Form 1 (objection) or Form 2 (correction or deletion), which are attached to this Manual as Annexure B.
- 9.3 The requestor must provide sufficient detail to enable the Information Officer to identify the record(s) requested and the requestor. The requestor must indicate which form of access is required, identify the right that he/she is seeking to exercise or protect and provide an explanation of why the requested record is required for the exercise or protection of that right.
- 9.4 If the request is made on behalf of another person, the requestor must submit proof of the capacity in which the requestor is making the request, to the reasonable satisfaction of the Information Officer.

9.5 PAIA makes provision for certain grounds upon which a request for access to information must be refused. On this basis, the Information Officer will decide whether or not to grant a request for access to information.

10. APPLICABLE TIME PERIODS

10.1 Glacier will inform the requester within 30 days after receipt of the request of its decision whether or not to grant the request.

10.2 The 30-day period may be extended by a further period of not more than 30 days if the request is for a large number of records or requires a search through a large number of records and compliance with the original period would unreasonably interfere with the activities of Glacier or the records are not located at Glacier's offices.

11. OUTCOME OF THE REQUEST

11.1 Should the request be refused, the notice will state adequate reasons for the refusal, including the provisions of the PAIA relied upon; and that the requester may lodge an application with a Court against the refusal of the request.

12. GROUNDS FOR REFUSAL OF ACCESS TO RECORDS

12.1 In terms of Section 62 to 69 of PAIA access granted to a record may be refused on one or more of the following grounds –

12.1.1 protection of privacy to a third party who is a natural person;

12.1.2 protection of the commercial information of a third party;

12.1.3 protection of certain confidential information of a third person;

12.1.4 protection of records privileged from production and legal proceedings;

12.1.5 the commercial information and activities of Glacier;

12.1.6 the protection of research information of a third party; and

12.1.7 any other ground legally available on which to refuse access to the information requested.

12.2 Despite any provisions of PAIA, a request must be granted if the disclosure of the record would reveal evidence of substantial contravention of, or failure to comply with, the law or imminent and serious public safety or environment risk, and the public interest in the disclosure of the record clearly outweighs the harm contemplated in terms of section 70 of PAIA.

13. REMEDIES FOR REFUSAL

Should the requester be dissatisfied with the Information Officer's decision to refuse access, that person may within 30 days after notification of the refusal apply to a Court for the appropriate relief.

14. AVAILABILITY OF THE MANUAL

14.1 A copy of the Manual is available-

14.1.1 on www.glacier.co.za;

14.1.2 head office for public inspection during normal business hours;

14.1.3 to any person upon request and upon the payment of a reasonable prescribed fee (if applicable); and

14.1.4 to the Information Regulator upon request.

14.2 A fee for a copy of the Manual, as contemplated in the Regulations, shall be payable per each A4-size photocopy made.

15. UPDATING OF THE MANUAL

This manual will be reviewed and updated, if necessary, on a periodic basis.

Issued by

Gudani Mukatuni: Chief Information Officer

(Insert the Name of the information Officer)

(Title of the head of the body. e.g. Chief Executive Officer)